

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

NEIL COLE,

Defendant.

No. 19-cr-00869 (ER)

**NOTICE OF MOTION *IN LIMINE* TO PERMIT EVIDENCE OF ICONIX'S
DECEMBER 2015 PURCHASE OF SEA 3 ASSETS**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law, defendant Neil Cole will move this Court, before the Honorable Edgardo Ramos, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York, on a date and time to be determined by the Court, for an order granting Mr. Cole's Motion *in Limine* to permit evidence of Iconix's December 2015 purchase of SEA 3 assets, and for such other relief as the Court may deem just and proper.

Dated: New York, New York
October 3, 2022

/s/ Sean Hecker

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